

The Hon. Robert J. Bryan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL JOHN SCOTT,

Defendant.

NO. CR20-018-RJB

**FORFEITURE BILL OF
PARTICULARS**

The United States, by and through its undersigned counsel, hereby submits this
Forfeiture Bill of Particulars pursuant to Fed. R. Crim. P. 7(f) and 32.2(a).

1. As alleged in the Superseding Indictment, the United States is seeking the
forfeiture of property in this case, pursuant to 21 U.S.C. § 853, 18 U.S.C. § 924(d)(1) and
by way of 28 U.S.C. § 2461(c), and 18 U.S.C. § 982(a)(1), of the following property:

- a. Fourteen thousand, one hundred dollars (\$14,100.00), more or less,
seized from a 2014 black BMW 535 bearing Washington license plate
BMV064, located in Whatcom County, Washington, on January 30,
2020;

- b. Nine thousand, nine hundred and eighty dollars (\$9,980.00), more or less, seized from 8024 150th Street SE, Snohomish, Washington, on January 30, 2020;
- c. Two gold fifty-dollar (\$50) bars, seized from 8024 150th Street SE, Snohomish, Washington, on January 30, 2020;
- d. Two one-ounce gold bars, seized from 8024 150th Street SE, Snohomish, Washington, on January 30, 2020;
- e. Four wristwatches, to include: (1) a limited edition Chicago Cubs wristwatch; (2) a silver Rolex wristwatch; (3) a Gucci wristwatch; and (4) a ladies Rolex wristwatch, all seized from 8024 150th Street SE, Snohomish, Washington, on January 30, 2020;
- f. Two diamond rings, seized from 8024 150th Street SE, Snohomish, Washington, on January 30, 2020; and
- g. A sum of money representing the proceeds that MICHAEL JOHN SCOTT obtained as a result of the Conspiracy to Distribute Controlled Substances alleged in Count 1 of the Indictment.

Dkt. No. 26, at pp. 7-10.

2. The United States hereby gives notice that, in addition to all the forfeiture allegations contained in the Superseding Indictment, the United States further alleges that the following property is subject to forfeiture:

- h. A Dodge Ram 2500, VIN No. 3D7UT2CLXBG564155, Washington State License No. C40349F, seized on or about January 30, 2020, from the Defendant's residence located in Snohomish, Washington.**

3. Pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 982(a)(1), upon conviction of any of the offenses charged in Counts 1 through 3, 6, and 7 of the Superseding Indictment, Defendant Michael John Scott shall forfeit to the United States any property constituting or derived from, or traceable to any proceeds the Defendants obtained,

1 directly or indirectly, as the result of such offenses, and shall also forfeit any property
2 used, or intended to be used, in any manner or part, to commit or to facilitate the
3 commission of such offenses – including, but not limited to, the above-identified
4 property.

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6 DATED this 9th day of September, 2021.

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8 Respectfully submitted,

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10 Acting United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2021, I electronically filed the foregoing Forfeiture Bill of Particulars with the Clerk of the Court using the CM/ECF system, which automatically serves the parties of record.

s/ Donna R. Taylor
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